

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x  
UNITED STATES OF AMERICA

- v. -

KUSHTRIM DEMAJ,  
BIBA KAJTAZI,  
a/k/a "Bobby,"  
PETRIT BICAJ,  
CHAD MIELE, and  
MUSA DEMAJ,

Defendants.

USDC SEN.
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 4/21/16

SEALED  
INDICTMENT

( S3 ) 16 Cr. \_\_\_\_

**16 CRIM 289**

- - - - - x  
COUNT ONE

(Narcotics Distribution Conspiracy)

The Grand Jury charges:

1. From at least in or about April 2015, up to and including on or about April 21, 2016, in the Southern District of New York and elsewhere, KUSHTRIM DEMAJ, BIBA KAJTAZI, a/k/a "Bobby," PETRIT BICAJ, and CHAD MIELE, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that KUSHTRIM DEMAJ, BIBA KAJTAZI, a/k/a "Bobby," PETRIT BICAJ, and CHAD MIELE, the defendants, and others known and unknown,

would and did distribute and possess with intent to distribute a controlled substance in violation of 21 U.S.C. § 841(a)(1).

3. The controlled substance that KUSHTRIM DEMAJ, BIBA KAJTAZI, a/k/a "Bobby," PETRIT BICAJ, and CHAD MIELE, the defendants, conspired to distribute and possess with intent to distribute was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO

(Narcotics Distribution Conspiracy)

The Grand Jury further charges:

4. From at least in or about March 2016, up to and including in or about April 21, 2016, in the Southern District of New York and elsewhere, KUSHTRIM DEMAJ and MUSA DEMAJ, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

5. It was a part and an object of the conspiracy that KUSHTRIM DEMAJ and MUSA DEMAJ, the defendants, and others known and unknown, would and did distribute and possess with

intent to distribute a controlled substance in violation of 21 U.S.C. § 841(a)(1).

6. The controlled substance that KUSHTRIM DEMAJ and MUSA DEMAJ, the defendants, conspired to distribute and possess with intent to distribute was a quantity of mixtures and substances containing a detectable amount of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATIONS

7. As a result of committing the controlled substance offenses alleged in Count One of this Indictment, KUSHTRIM DEMAJ, BIBA KAJTAZI, a/k/a "Bobby," PETRIT BICAJ, and CHAD MIELE, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of these offenses and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of such offenses.

8. As a result of committing the controlled substance offenses alleged in Count Two of this Indictment,

KUSHTRIM DEMAJ and MUSA DEMAJ, the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of these offenses and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of such offenses.

SUBSTITUTE ASSETS PROVISION

9. If any of the property described above as being subject to forfeiture, as a result of any act or omission of KUSHTRIM DEMAJ, BIBA KAJTAZI, a/k/a "Bobby," PETRIT BICAJ, CHAD MIELE, and MUSA DEMAJ, the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Sections 853(p) to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 21, United States Code, Section 853.)



A handwritten signature consisting of the letters "Brooks" written in cursive script, followed by a horizontal line underneath.

FOREPERSON



A handwritten signature consisting of the letters "Preet Bharara" written in cursive script, followed by a horizontal line underneath.

PREET BHARARA  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KUSHTRIM DEMAJ,  
BIBA KAJTAZI, a/k/a "BABY,"  
DETAKI DUGAJ,  
CHAD MIRK, and  
MUSA DEMAJ.

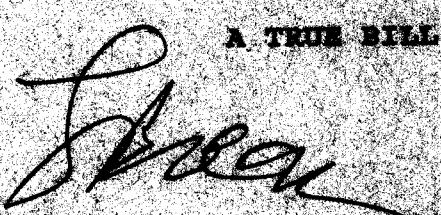
Defendants.

INDICTMENT

S3 16 Cr. \_\_\_\_  
(21 U.S.C. § 846.)

PROSECUTOR  
United States Attorney

A TRUE BILL

  
Foreperson.

4/21/16 Fd. Superseding Indictment under seal, New York issued.

  
Fitzgerald, USM J